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REPORTS ANALYSIS DIVISION REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: October 14, 2011

ANALYST: Christopher Whyrick

I. COMMITTEE:

Scalise for Congress

C00394957

William Vanderbrook, Treasurer (6/23/08 -present) Edgar J. Dillard, Treasurer (1/16/08 - 6/22/08) Sally A. Nungesser, Treasurer (12/17/07 - 1/15/08)

P.O. Box 23219

Jefferson, LA 70183-3219

II. RELEVANT STATUTE:

2 U.S.C. § 441(f)

III. BACKGROUND:

Other Violations of the Federal Election Campaign Act (2 U.S.C. § 441(f), Contributions in Name of Another Prohibited)

On June 17, 2011, a Compliance Consultant for Scalise for Congress ("the Committee"), Lynnel Ruckert, called the Reports Analysis Division (RAD) Analyst to report receipt of contributions suspected to have been made by a contributor in the name of another. Ms. Ruckert informed the Analyst that the Committee just learned that contributions from three individuals reported on the 2007 Year End Report were reimbursed by another individual contributor, who also made a contribution in his own name during the same reporting period (Attachment 2). The contributions totaled \$9,260.00. Ms. Ruckert requested information on how to best approach this situation. The Analyst recommended she follow the sua sponte guidelines set forth by the Federal Election Commission (FEC) and file a Miscellaneous Electronic Submission ("Form 99") outlining the known circumstances as well as the remedial steps the Committee planned to take (Attachment 3).

On Junu 21, 2011, the Committee filed a Form 99 which stated in full:

"On December 19, 2997, the Scalise for Congress campaign received four checks as part of a fundraising event. These checks were in the amounts of \$2,300 each

from William Bennett, Julie Ott, James Wyckoff and Melanie Detloff. On June 15, 2011, the campaign was notified by a donor, William Burnett, that he reimburand the other three individuals named above for their responsive contributions to the Scalise for Congress campaign. Enforce this natification on June 15, 2011, the campaign never had any information that would have led to question the validity of the checks. The checks in question were reported on the FEC report filed for the fourth quarter 2007. The Scalise for Congress campaign is now disporging the four contributions totaling \$9,200. As part of this filing, the campaign is mailing a check for \$9,200 to the U.S. Department of the Treasury along with a capy of this lener. The Scaling for Congress campaign will report these transactions in its second quarter 2011 FEC filing" (Image 11931721993).

On July 14, 2011, the Committee filed the 2011 July Quarterly Report covering the period from April 1, 2011 through June 30, 2011. The report disclosed \$9,200.00 in disgorgements to the U.S. Treasury on June 21, 2011 on Schedule B supporting Line 21 (Other Disbursements) of the Detailed Summary Page (Image 11931824857).

On September 8, 2011, the Analyst attempted to content William Vanderbreak, the transmer of the Committee. The Analyst left a massage for Mr. Vanderbrook offering the opportunity to file anything additional he felt pertinent that would further clarify the circumstances of the apparent 2 U.S.C. § 441(f) violation (Attachment 3).

On September 21, 2011, the Analyst left a voicemail for Ms. Ruckert concerning the same issue. On September 22, 2011, Ms. Ruckert returned the Analyst's call and stated that the Committee did not have anything to add to the previously filed Form 99 concerning their receipt of contributions made in the name of another.

To date, no further communications have been received from the Committee regarding filis matter.

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Scalise for Congress (C00394957) Contributions in the Name of Another

2007 Year End Report

Contributor Name	Date	Amount	Election Designation	Image Number
William Bennett	12/19/2007	\$2,300.00	2008 Special Primary	28990265522
Melanie Detloff	12/19/2007	\$2,300.00	2008 Special Primary	28990265526
Julie Ott	12/19/2007	\$2,300.00	2008 Special Primary	28990265543
James Wyckoff	12/19/2007	\$2,300.00	2008 Special Primary	28990265551